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JmJ  
TORKILDSON, KATZ, MOORE,  
HETHERINGTON & HARRIS,  
Attorneys at Law, A Law Corporation

TAMARA M. GERRARD, #6153-0  
(tmg@torkildson.com)  
700 Bishop Street, Suite 1500  
Honolulu, HI 96813-4187  
Telephone: (808) 523-6000  
Facsimile: (808) 523-6001

NEWTON J. CHU, #6537-0  
(newtonc@torkildson.com)  
VAUGHN G.T. COOK, #7914-0  
(vcook@torkildson.com)  
120 Pauahi Street, Suite 312  
Hilo, HI 96720-3048  
Telephone: (808) 961-0406  
Facsimile: (808) 961-3815

Attorneys for Defendants  
CHARLES A. JOHNSON, P.C.;  
THOMAS W. JOHNSON; AND  
ARBOR SYSTEMS, GROUP, INC.  
DBA JOHNSON & ASSOCIATES TAX  
& ACCOUNTING SERVICES

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII  
AUG 03 2009  
at 1 o'clock and 10 min. 4 M.  
SUE BEITIA, CLERK

CV 09-00356

JMS KSC

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

NADINE A. CALUAG,

Plaintiff,

vs.

CHARLES A. JOHNSON, P.C.;  
THOMAS W. JOHNSON; and ARBOR  
SYSTEMS, GROUP, INC. dba  
JOHNSON & ASSOCIATES TAX &  
ACCOUNTING SERVICES; JOHN  
AND MARY DOES 1-10; DOE  
CORPORATIONS, PARTNERSHIPS  
or OTHER ENTITIES 1-10;

Defendants.

CIVIL NO. CV \_\_\_\_\_

DEFENDANTS CHARLES A.  
JOHNSON, P.C.; THOMAS W.  
JOHNSON; AND ARBOR SYSTEMS,  
GROUP, INC. DBA JOHNSON &  
ASSOCIATES TAX & ACCOUNTING  
SERVICES' **NOTICE OF REMOVAL  
OF STATE COURT ACTION TO  
FEDERAL COURT**; EXHIBIT "A";  
CERTIFICATE OF SERVICE

DEFENDANTS CHARLES A. JOHNSON, P.C.; THOMAS W.  
JOHNSON; AND ARBOR SYSTEMS, GROUP, INC. DBA JOHNSON &  
ASSOCIATES TAX & ACCOUNTING SERVICES' NOTICE OF  
REMOVAL OF STATE COURT ACTION TO FEDERAL COURT

Defendants CHARLES A. JOHNSON, P.C.; THOMAS W. JOHNSON; and  
ARBOR SYSTEMS, GROUP, INC. dba JOHNSON & ASSOCIATES TAX &  
ACCOUNTING SERVICES ("Defendants"), by and through their undersigned  
counsel, give notice of removal to the United States District Court For the District

of Hawaii of the Hawaii Circuit Court action entitled Nadine A. Caluag v Charles A. Johnson, P.C.; Thomas W. Johnson; Arbor Systems Group, Inc. dba Johnson & Associates Tax & Accounting Services, et al., Civil No. 09-1-0232K, filed in the Circuit Court of the Third Circuit (Kona), State of Hawaii.

This Notice of Removal is made pursuant to 38 U.S.C. §§ 1331 and 1441 and is based on the following:

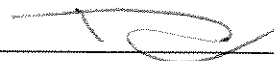
1. Plaintiff's Complaint in this matter was filed in the Circuit Court of the Third Circuit (Kona), State of Hawaii, on June 12, 2009
2. A copy of the Complaint was served on Defendants Thomas W. Johnson and Arbor Systems Group on July 6, 2009, and is attached hereto as **Exhibit "A"**.
3. The Complaint alleges at paragraph 15 "All Defendants violated the RICO statute." "RICO" is the commonly used acronym for the Racketeer Influenced and Corrupt Organizations statute embodied d at 18 U.S.C. § 1961, et seq.
4. The Court, therefore, has jurisdiction pursuant to 38 U.S.C. § 1331.

WHEREFORE, Defendants request that this action brought by Plaintiff in the Circuit Court of the Third Circuit, State of Hawaii, and designated as Civil No.

09-1-00232K, be removed to the United States District Court For the District of Hawaii.

DATED: Honolulu, Hawaii, August 3, 2009.

TORKILDSON, KATZ, MOORE,  
HETHERINGTON & HARRIS,  
Attorneys at Law, A Law Corporation



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TAMARA M. GERRARD  
Attorneys for Defendants  
CHARLES A. JOHNSON, P.C.;  
THOMAS W. JOHNSON; and ARBOR  
SYSTEMS, GROUP, INC. dba  
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